

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 20-203 (PAM/KMM)

United States of America,

Plaintiff,

v.

Francisco Manuel Rodriguez Valenzuela,

Defendant.

**MOTION TO SUPPRESS
EVIDENCE OBTAINED
IN VIOLATION OF THE
FOURTH AMENDMENT**

Defendant Francisco Manuel Rodriguez Valenzuela, by and through his attorney, Steven J. Wright, moves the Court under Rule 12 of the Federal Rules of Criminal Procedure for an order suppressing all evidence obtained as a result of a traffic stop occurring on August 23, 2020. This stop, based largely on a 911 call, was made without reasonable suspicion of criminal activity and was therefore unjustified under the Fourth Amendment. Defendant also challenges the subsequent search of the vehicle, which was conducted with neither warrant nor probable cause, and was similarly in violation of rights guaranteed by the Fourth Amendment. Defendant asks that the fruits of the unconstitutional stop and search be suppressed.

This motion is based on the indictment, records, and files in this matter, and on any and all other matters that may be presented prior to or at the time of the hearing on this motion.

Respectfully submitted,

Dated: October 13, 2020

/s/ Steven J. Wright
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Attorney for Defendant